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15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 LAS VEGAS SUN, INC., a Nevada  
18 corporation,

19 Plaintiff,

20 v.

21 SHELDON ADELSON, an individual and  
as the alter ego of News+Media Capital  
Group LLC and as the alter ego of Las  
Vegas Review Journal, Inc.; PATRICK  
22 DUMONT, an individual; NEWS+MEDIA  
CAPITAL GROUP LLC, a Delaware  
23 limited liability company; LAS VEGAS  
REVIEW-JOURNAL, INC., a Delaware  
24 corporation; and DOES, I-X, inclusive,

25 Defendants.  
26  
27  
28

Case No.: 2:19-cv-01667-GMN-VCF

**MOTION TO REDACT PORTIONS OF  
JANUARY 5, 2021, HEARING  
TRANSCRIPT REFERENCING AND  
QUOTING SEALED EXHIBITS [ECF NO.  
303]**

1 LAS VEGAS REVIEW-JOURNAL, INC.,  
2 a Delaware corporation,

3 Counterclaimant.

4 v.

5 LAS VEGAS SUN, INC., a Nevada  
6 corporation; BRIAN GREENSPUN, an  
7 individual and as the alter ego of Las  
8 Vegas Sun, Inc.; GREENSPUN MEDIA  
9 GROUP, LLC, a Nevada limited liability  
10 company, as the alter ego of Las Vegas  
11 Sun, Inc.

12 Counterclaim Defendants.

On January 5, 2021, the Court heard oral argument on Plaintiff's Motion to Reconsider Previous Discovery Rulings Based on New Evidence. ECF Nos. 241 and 242 (FUS). At the same hearing, the Court also issued rulings on several of the parties' pending motions to seal various exhibits attached to discovery briefs, including Plaintiff's Motion for Leave to File Documents Under Seal [Exhibits 3, 4, and 5 to Motion to Reconsider Previous Discovery Rulings Based on New Evidence and References Thereto] at ECF No. 240 (the "Motion to Seal"). *See* ECF No. 297. The Court granted in part and denied in part Plaintiff's Motion to Seal. *Id.* Specifically, the Court sealed Exhibits 3 and 4, requested supplemental briefing related to Exhibit 5, and held ruling on Exhibit 5 in abeyance until it considered the supplemental briefing. ECF No. 303 at 56:15–58:7; *see also* LR 10-5(a) (stating all papers filed under seal will remain sealed until the court either denies the motion to seal or enters an order sealing them).

During the January 5, 2021, hearing, both parties referenced and quoted portions of Exhibits 3–5. Because those exhibits are all currently filed under seal, Defendants respectfully request the portions of the January 5, 2021, hearing transcript (ECF No. 303) at 21:18–19, 21:20–21, 21:25, 32:16–18, 32:20–22, 33:1, 33:2–5, 33:23–25 that reference or quote Exhibits 3–5 be redacted. *See Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006).

Dated: January 29, 2021

KEMP JONES, LLP

/s/ Michael Gayan

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**PROOF OF SERVICE**

I hereby certify that on the 29th day of January, 2021, I served a true and correct copy of the foregoing **MOTION TO REDACT PORTIONS OF JANUARY 5, 2021, HEARING TRANSCRIPT REFERENCING AND QUOTING SEALED EXHIBITS [ECF NO. 303]** via the United States District Court's CM/ECF electronic filing system to all parties on the e-service list.

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